

**FORM  
INSP**Rev  
X/15**State of Colorado  
Oil and Gas Conservation Commission**1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109

Inspection Date:

03/24/2020

Submitted Date:

03/30/2020

Document Number:

693901585**FIELD INSPECTION FORM**Loc ID 325961 Inspector Name: ROY, CATHERINE On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**OGCC Operator Number: 10133Name of Operator: HILCORP ENERGY COMPANYAddress: P O BOX 61229City: HOUSTON State: TX Zip: 77208**Status Summary:**

- ☐ THIS IS A FOLLOW UP INSPECTION
- ☐ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED

**Findings:**5 Number of Comments2 Number of Corrective Actions☒ Corrective Action Response Requested**ANY CORRECTIVE ACTION(S) FROM  
PREVIOUS INSPECTIONS THAT HAVE NOT  
BEEN ADDRESSED ARE STILL APPLICABLE****Contact Information:**

Contact Name	Phone	Email	Comment
Ray, Mandy	(505) 599-4083	mray@hilcorp.com	<a href="#">All Inspections</a>
Shorty, Priscilla		pshorty@hilcorp.com	<a href="#">All SW Inspections</a>

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
215638	WELL	PA	04/12/2016	GW	067-07243	ALLISON UNIT 116	RI

**General Comment:**

On 3/24/2020 Catherine Roy conducted a reclamation and stormwater inspection. Document 401040408 describes plugging the well on 4/12/2016. During this inspection the following compliance issues were observed:

- Equipment needs to be removed.
- Revegetation needs to be conducted throughout the majority of the project area.
- Revegetation and weeds need to be monitored and managed by a qualified vegetation specialist, until passing final reclamation. Documentation of monitoring/management may be requested as part of this corrective action.
- Erosion and stormwater controls need to be installed until location is stabilized with desirable perennial vegetation.

Operator is directed to perform corrective actions outlined on this inspection report immediately. Doing so may decrease the duration of alleged violations and the penalties that may be assessed pursuant to Rule 523. Corrective action dates are not assigned as it is the expectation that the location be at or near completed final reclamation when inspection is conducted in response to Form 4 request for final reclamation.

This final reclamation inspection was conducted in response to the operator submitting official documents to imply or directly state that final reclamation is complete per a final reclamation inspection request and/or a bond release request. Upon inspection, it is evident that significant elements of final reclamation are not complete. Per COGCC rules, submission of falsified documentation can be considered an aggravating factor if, or when, enforcement actions are recommended.

See below, and attached photos for additional detail.



**Reclamation - Storm Water - Pit****Interim Reclamation:**

Date Interim Reclamation Started: \_\_\_\_\_ Date Interim Reclamation Completed: \_\_\_\_\_

Land Use: \_\_\_\_\_

Comment: \_\_\_\_\_

**1002 SITE PREPARATION AND STABILIZATION**

1002a. FENCING \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002b. SOIL REMOVAL AND  
SEGREGATION \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002c. PROTECTION OF SOILS \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002E. SURFACE DISTURBANCE MINIMIZATION \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1003a. Waste and Debris removed? \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

Unused or unneeded equipment onsite? \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

Pit, cellars, rat holes and other bores closed? \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

Guy line anchors marked? \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

- 1003b. Area no longer in use? \_\_\_\_\_ Production areas stabilized ? \_\_\_\_\_
- 1003c. Compacted areas have been cross ripped? \_\_\_\_\_
- 1003d. Drilling pit closed? \_\_\_\_\_ Subsidence over on drill pit? \_\_\_\_\_
- Cuttings management: \_\_\_\_\_
- 1003e. Areas no longer needed for drilling or subsequent operations for have been re-vegetated to 80% of pre-existing? \_\_\_\_\_
- Production areas have been stabilized? \_\_\_\_\_ Segregated soils have been replaced? \_\_\_\_\_

**RESTORATION AND REVEGETATION**Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ Perennial forage re-established \_\_\_\_\_

Non-Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ 80% Revegetation \_\_\_\_\_

## 1003e. INTERIM VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% \_\_\_\_\_

TRANSECT RESULTS OF REFERENCE AREA% \_\_\_\_\_

TOTAL % OF DESIRABLE VEGETATION COVER \_\_\_\_\_

VEGETATIVE COVER \_\_\_\_\_

1003 f. Weeds Noxious weeds? \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_ Date \_\_\_\_\_

Overall Interim Reclamation

**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: \_\_\_\_\_ Date Final Reclamation Completed: \_\_\_\_\_

Final Land Use: \_\_\_\_\_

Reminder: \_\_\_\_\_

Comment: \_\_\_\_\_

Well plugged \_\_\_\_\_ Pit mouse/rat holes, cellars backfilled \_\_\_\_\_

Debris removed **Fail** \_\_\_\_\_ No disturbance /Location never built \_\_\_\_\_

Access Roads Regraded \_\_\_\_\_ Contoured \_\_\_\_\_ Culverts removed \_\_\_\_\_

Gravel removed \_\_\_\_\_

Location and associated production facilities reclaimed **Fail** \_\_\_\_\_ Locations, facilities, roads, recontoured \_\_\_\_\_

Compaction alleviation \_\_\_\_\_ Dust and erosion control \_\_\_\_\_

Non cropland: Revegetated 80% \_\_\_\_\_ Cropland: perennial forage \_\_\_\_\_

Weeds present \_\_\_\_\_ Subsidence \_\_\_\_\_

## 1004.d. FINAL VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% \_\_\_\_\_

TRANSECT RESULTS OF REFERENCE AREA% \_\_\_\_\_

TOTAL % OF DESIRABLE VEGETATION COVER \_\_\_\_\_

VEGETATIVE COVER \_\_\_\_\_

Comment: Revegetation is failed within the project area as little desirable vegetation present over the majority of the well pad. A vegetation transect was conducted and identified no desirable vegetation along the transect. Dense Russian thistle present throughout the project area.  
Electrical equipment with exposed wiring observed within the southwestern project area.

Corrective Action:	<p>-Revegetation needs to be conducted throughout the majority of the project area. Revegetation needs to be monitored by qualified personnel, knowledgeable of revegetation, weeds, and stormwater, and managed as needed to ensure that revegetation is increasing. Documentation of monitoring may be requested. Livestock exclusion will likely be needed for successful revegetation.</p> <p>-Remove unused equipment.</p>	Date _____
Overall Final Reclamation <input type="checkbox"/> Well Release on Active Location <input type="checkbox"/> Multi-Well Location <input type="checkbox"/>		

**Storm Water:**

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Comment: <u>Erosional rilling and channeling is occurring on bare soils in the northern project area.</u>						
Corrective Action: <u>Erosion controls (ie: mulch, blankets, etc.) and stormwater controls (ie: BMPs) are needed throughout the project area until the location is stabilized with desirable perennial vegetation.</u>						Date: _____
Pits: <input checked="" type="checkbox"/> NO SURFACE INDICATION OF PIT						

**Attached Documents**

You can go to COGCC Images (<https://cogcc.state.co.us/weblink/>) and search by document number:

Document Num	Description	URL
402357069	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5110408">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5110408</a>
402357298	Transect Datasheet	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5110686">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5110686</a>
693901586	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5110397">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5110397</a>
693901587	Transect Datasheet	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5110398">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5110398</a>